

Exhibit 4

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

**IN RE CATTLE AND BEEF
ANTITRUST LITIGATION**

Civil No. 20-cv-1319 (JRT/HB)

Judge John R. Tunheim

This document relates to:

ALL CASES

**PLAINTIFFS' JOINT REVISED PROPOSAL RE: DOCUMENT CUSTODIANS,
NON-CUSTODIAL DOCUMENT SOURCES, AND DATE RANGES TO JBS USA
FOOD COMPANY, SWIFT BEEF COMPANY, JBS PACKERLAND, INC.,
AND JBS S.A.**

Cattle, Peterson, DPP, E&G and Winn-Dixie Plaintiffs¹ in the above-captioned matter (“Plaintiffs”), through their counsel, submit the following Joint Revised Proposal re: Document Custodians, Non-Custodial Document Sources, and Production Date Range Disclosures pursuant to Section V of the Order Regarding Production of Electronically Stored Information and Paper Documents (ECF No. 93) (“ESI Protocol”) to Defendants JBS USA Food Company, Swift Beef Company, JBS Packerland, Inc., and JBS S.A.

¹ As used throughout, *Cattle, Peterson, DPP, E&G, Winn-Dixie*, refer to *In re Cattle Antitrust Litigation*, Case No. 19-cv-1222; *Peterson v. JBS USA Food Company Holdings, et al.*, Case No. 19-cv-1129; *In re DPP Beef Litigation*, Case No. 20-cv-1319; *Erbert & Gerbert’s, Inc. v. JBS USA Food Company Holdings, et al.*, Case No. 20-cv-1414; and *Winn-Dixie Stores, et al. v. Cargill, Inc., et al.*, Case No. 21-cv-1751, respectively.

(collectively, “JBS”) in response to JBS’s proposals served Friday November 5, 2021 (“JBS Proposals”).

This Joint Revised Proposal supersedes all proposed additional Document Custodians, Non-Custodial Document Sources the Classes have issued to date in response to JBS’ Updated Initial Proposal for Document Custodians, Non-Custodial Document Sources, and Date Ranges, served in both *Cattle* and *Peterson* on September 16, 2020. Specific to Date Ranges, Plaintiffs outline their joint position with respect to the first set of Requests for Production (“RFPs”) previously served by the *Cattle* and Consumer Indirect Purchaser Plaintiffs (“Cattle Set One” and “Beef Set One”, respectively).² In the interest of judicial economy and efficiency, and without waiving any of their rights, Plaintiffs have addressed certain Cattle and Beef Set One RFPs together for this purpose where they cover similar subjects.

Plaintiffs reserve their right to amend and/or supplement these proposed additional Custodians, Non-Custodial Document Sources, and Date Range proposals at any appropriate time, including upon the service of further Rule 34 requests for production, if they obtain additional or more accurate information, or if otherwise appropriate based upon the Court’s subsequent orders or as a result of the parties’ upcoming meet and confers. In particular, as JBS has yet to propose any custodians or non-custodial sources for JBS S.A., despite discovery being lifted against it, Plaintiffs expect to add additional custodians and

² *Cattle* Plaintiffs’ First Set of Requests to All Defendants for the Production of Documents and Electronically Stored Information served on June 19, 2021 (“Cattle Set One”); Consumer Indirect Purchaser Plaintiffs’ First Set of Requests for Production of Documents to all Defendants served on June 19, 2021 (“Beef Set One”).

non-custodian sources for JBS S.A. once it has an opportunity to meet and confer with JBS on the matter.

In making these proposals, Plaintiffs make no representations regarding whether they may use any documents, people, or information listed herein in support of their claims or defenses in this matter.

PLAINTIFFS’ PROPOSED ADDITIONAL DOCUMENT CUSTODIANS, NON-CUSTODIAL DOCUMENT SOURCES, AND COUNTER PROPOSAL ON PRODUCTION DATE RANGE

Subject to the reservations detailed above, Plaintiffs propose the following additional document custodians, non-custodial document sources, and alternative production date ranges. The proposed document custodians and non-custodial documents sources are in addition to those already proposed in the JBS Proposals.

I. ADDITIONAL DOCUMENT CUSTODIANS³

Director/Executive/Corporate

1. Al Almanza (JBS Global Food Supply Director)
2. Joesley Mendonca Batista (JBS USA/Swift/Packerland Director (2014 – June 2017))⁴
3. Wesley Mendonca Batista (JBS USA/Swift/Packerland Director (2014 – June 2017))
4. Cameron Bruett (Head of Corporate Affairs & CSO)
5. Al Byers (Packerland President and COO (2014 – present))
6. Darren Davenport (Swift Beef Outside Sales, EVP of National Sales (2019 – present))
7. Gregory DeBoer (Key Account Manager, Beef Sales (2017 – present))
8. Hyrum Egbert (Head of Sales)
9. John Flynn (Swift Beef Domestic Sales and Marketing (2014 – present))
10. Jerry Gee (Swift Beef Head of Inside Sales (2016 – present))

³ The sub-headings outlined below are provided for convenience only and reflect Plaintiffs’ investigations to date.

⁴ Position and tenure information is provided for convenience only and reflect Plaintiffs’ investigation to date.

11. Pete Giannetti (Foodservice Sales – Beef (2011-2015))
12. Rafael Harada (Head of Risk Management)
13. Heidi Harrison (Packerland Finance, Regional Beef (2014 – present))
14. Fabio Haubrich (Swift Beef Head of International Sales (2017 – present))
15. Tyler Hodgson (Head of Greeley Sales)
16. Kim Holzner (Head of Imports)
17. Chris Jensen (VP, Sales)
18. Jason Kuan (President, Case Ready Business (August 2014 – April 2017))
19. Bill Lovette (JBS USA Director (2014 – November 2015))
20. Brian MacFarlane (JBS Corporate Director of Technical Service)
21. Denilson Goncalves Molina (JBS USA CFO (2012 – present); Director JBS USA/Swift/Packerland (June 2017 – present); CFO Packerland (2015 – present))
22. Bill Munns (JBS USA Head of Sales & Supply Chain, Regional Beef (current); Marketing Director (6/01/2015 – 1/2020); Corporate Product Manager (through May 31, 2015))
23. Andre Nogueira (JBS USA President and CEO (entire period); CEO Swift Beef (entire period); Director JBS USA/Swift/Packerland (Nov. 2015 – present))
24. Brian Piedmonte (JBS USA President, Case Ready Business (May 2017 – 2019))
25. Kim Posvic (Swift Beef Fed Beef Head of Cattle Procurement (2014 – present))
26. Eric Pruitt (Western Regional Foodservice Sales Manager (2018-present))
27. Stephany Rockwell (JBS USA Risk Manager)
28. Luis Rota (Swift Beef International Sales (2014 – 2017) and (August 2020 – present))
29. Oliva Rush (JBS USA Cattle Procurement Analyst)

30. Karl Skold (JBS USA Head of Agricultural Economics)
31. Jose Batista Sobrinho
32. Gilberto Tomazoni (JBS USA/Swift/Packerland Director (June 2017 – present))
33. Eric Wallin (Swift Beef SVP and Head of Beef Finance and Business Analysis (2014 – 2016))
34. Each employee, not named above or in the JBS Proposal, who:
 - a. was responsible for providing economic analysis of the fed cattle and live cattle markets between January 1, 2012, and June 30, 2020 (“Core Production Period”);
 - b. was responsible for JBS’s live cattle futures and options positions during the Proposed Production Period;
 - c. regularly attended the daily meetings described in paragraph 88 of the Third Consolidated Amended Complaint (*Cattle*. ECF No. 312) during the Core Production Period; and/or
 - d. was responsible for the “automated data pull” which submitted JBS’s purchase and sales data to the USDA pursuant to Livestock Mandatory Reporting Act (see JBS Disclosures Pursuant to Attachment 1 of ECF No. 196, served June 12, 2020, at 11).

Assistants

35. Shirley Araujo (Assistant to Tim Schellpeper)
36. Erin Becker (Assistant to Denilson Goncalves Molina)
37. Cassia Carpio (Assistant to Bill Rupp)
38. Alyssa Heffner (Assistant to Denilson Goncalves Molina)
39. Lopez Martha (Assistant to Denilson Goncalves Molina)
40. Valerie Richards (Assistant to Wesley Mendoca Batista Filho, Andre Nogueira)
41. Valerie Brandt (Assistant to Al Byers)

42. Each employee, not named above or in the JBS Proposal, who acted as an assistant to one or more of the proposed JBS custodians during the Core Production Period and possess responsive non-duplicative information.

Plant

43. Manny Guerero (General Manager, Amarillo, TX)
44. James Hooker (Head of Fabrication, Amarillo, TX)
45. Patrick Pridie (General Manager, Souderton, PA)
46. Ryan Wagnon (Head of Slaughter Ops, Amarillo, TX)
47. Each Complex/General Manager, Head of Fabrication, and Head of Slaughter Operations at each of JBS's fed cattle slaughter plants during the Core Production Period.

Field

48. Matt Arendt (Cattle Buyer)
49. Levi Canales (Cattle Buyer)
50. Kelley Clark (Cattle Buyer)
51. Casey Davis (Cattle Procurement)
52. Tyson Eggers (Cattle Buyer)
53. Garrett Englin (Cattle Procurement)
54. Jacob Franzluebbbers (Cattle Procurement)
55. Mike Gahagan (Cattle Procurement Manager)
56. JT Loewe (Cattle Procurement – Forward Contracting)
57. Ron Mayer (Cattle Buyer)
58. Chad Miller (Cattle Buyer)
59. Justin Miller (Cattle Buyer)
60. Fred Nichols (Cattle Procurement)
61. Lee Ray (Cattle Buyer)

62. Tom Savage (Cattle Buyer)
63. Travis Shunk (Cattle Buyer)
64. David Vanderboon (Cattle Procurement Manager)
65. Each Field and Regional Cattle Buyer engaged in the purchase of fed cattle on JBS's behalf during the Proposed Production Period.

II. ADDITIONAL NON-CUSTODIAL SOURCES

Plaintiffs propose the following non-custodial data sources:

1. Company phone records
2. JBS USA, Swift, and/or Packerland Intranet (if any)

III. ALTERNATIVE PRODUCTION DATE RANGES

Below, pursuant to §V(B)(1)(a)(c) of the ESI Protocol, Plaintiffs “make [their] counter-proposals on date ranges.” For the ease of negotiation, and in the interest of judicial economy and efficiency, Plaintiffs have addressed certain Cattle and Beef Set One RFPs together for this purpose where they cover similar subjects. Plaintiffs, however, expressly reserve their rights in this regard.⁵

Plaintiffs also reserve the right to revise their proposal as appropriate, including in response to the receipt of additional or more accurate information, the parties' forthcoming negotiations regarding their respective objections to each other's initial RFPs, proposed Document Custodians, Non-Custodial Sources, and Date Ranges, or any subsequent court order. In proposing the below Date Ranges, Plaintiffs reserve their right to challenge any and all of JBS's responses and objections to Plaintiffs' Initial RFPs.

⁵ Unless otherwise indicated, all capitalized terms will have the same meaning as described in Cattle and Beef Set One RFPs.

Proposed Date Ranges for Cattle Set One and Peterson Crossover RFPs

RFP No.	Relevant Peterson RFP(s)	Request	JBS's Proposed Date Range	Plaintiffs' Proposed Date Range
1	N/A	Documents and Communications sufficient to show Your compliance policies, whether implemented, adopted, used, or considered, concerning federal, state, or international antitrust laws, competition laws, anti-monopoly laws, anti-cartel laws, commodities laws, CME rules, unfair competition laws, anti-bribery laws, and any similar laws or regulations; or policies concerning contacts and/or Communications with Your competitors. This Request includes: (i) current and former versions of such compliance policies and procedures; (ii) presentations, seminars, programs, and memos Concerning such compliance policies and procedures; and (iii) statements signed by Your Employees working within Your Cattle Business that acknowledge receipt of or compliance with such policies and procedures.	January 1, 2012 – June 30, 2020	Agreed
2	13, 14	Transaction-level data for all of Your purchases, sales, trades, or any other transaction of or in Cattle, Beef, or Cattle Futures, including: all Cattle Purchase Data; all Beef Sales Data; all Order Data. This Request relates to the period from January 1, 2009, through the date of your response. Plaintiffs request this information in the	January 1, 2014 – June 30, 2020 JBS Defendants will meet-and-confer about the date ranges and	January 1, 2006 – December 31, 2021 Plaintiffs propose that the period January 1, 2006,

RFP No.	Relevant Peterson RFP(s)	Request	JBS's Proposed Date Range	Plaintiffs' Proposed Date Range
		most disaggregated form (meaning at the transactional level, not aggregated by month or quarter) in which it is kept, and Defendants should produce the data in a comma-delimited text file (<i>e.g.</i> , a file with a file extension of .csv or .txt). If You maintain separate or distinct sets of such data for internal purposes, or any other purpose, Plaintiffs' request is for each separate set of data.	the scope of the Request as indicated in their Responses and Objections.	to December 31, 2021 apply, but are willing to meet and confer with JBS to discuss both the availability of data and the appropriate start date of any such production.
3	3	All Documents and Communications concerning Fed Cattle, Cattle Futures, and/or Beef that You produced to or received from any regulatory body or government agency, including, the U.S. Department of Justice, U.S. Government Accountability Office, the USDA, U.S. Commodity Futures Trading Commission, CME, National Futures Association, U.S. Securities & Exchange Commission, U.S. Federal Trade Commission, Federal Bureau of Investigation, any state law enforcement agency official, or any committee or member of the United States Congress. This Request includes all: (i) Documents or Communications produced pursuant to grand jury subpoenas, civil investigative demand or any other request for production of documents or information (whether formal or informal); (ii) copies of any such	January 1, 2014 – June 30, 2020	January 1, 2012 – June 30, 2020, save that Plaintiffs expect Defendants to produce all materials related to the ongoing DOJ, State AG, and USDA investigations referred to in the complaint. Plaintiffs are willing to meet and confer with

RFP No.	Relevant Peterson RFP(s)	Request	JBS's Proposed Date Range	Plaintiffs' Proposed Date Range
		requests; (iii) all responses, objections, stipulations, modifications, production logs, privilege logs, or other parameters Concerning Your production of Documents and/or Communications to any such government or regulatory agency, (iv) transcripts of any governmental or regulatory proceedings or testimony; and (v) interrogatory answers, white papers, presentations, or other Documents or Communications produced to any such governmental or regulatory agency.		JBS as to whether there are specific regulatory productions or communications during the disputed period between January 1, 2012, and December 31, 2013, that might be appropriately excluded from its production in response to RFP 3.
4	2	All Communications or Documents Concerning Communications, agreements, or meetings between You and any Beef packer (including any other Defendant) concerning Your or another packer's Cattle Business, or the Cattle Business generally. Excluded from this request are any Documents or Communications in which Defendants' or third party Beef packers' veterinary Employees were the exclusive senders and recipients.	January 1, 2014 – June 30, 2020	January 1, 2012 – June 30, 2020

RFP No.	Relevant Peterson RFP(s)	Request	JBS's Proposed Date Range	Plaintiffs' Proposed Date Range
5	N/A	All Communications or Documents Concerning Communications between You and Producers Concerning Fed Cattle prices; Cattle Futures prices; Fed Cattle purchases; Fed Cattle deliveries; the basis on which You would, or would not, negotiate Fed Cattle purchases, including the application of the Queuing Convention or other similar rules or conventions; card drawing; Fed Cattle demand; Fed Cattle slaughter plant utilization and capacity; the Producer's Communications with another Packer; and Beef prices or demand. This request includes Communications with feedlots that You own.	January 1, 2014 – June 30, 2020	January 1, 2012 – June 30, 2020
6	N/A	All Communications or Documents Concerning Communications between You and third parties, including futures commission merchants and brokerage and clearing organizations, Concerning Your or another Defendants' Cattle Futures trading activity.	January 1, 2014 – June 30, 2020	January 1, 2012 – June 30, 2020 Plaintiffs are willing to meet and confer with JBS as to whether there are specific categories of responsive documents during the disputed period between January 1, 2012, and December 31,

RFP No.	Relevant Peterson RFP(s)	Request	JBS's Proposed Date Range	Plaintiffs' Proposed Date Range
				2013, that might be appropriately excluded from its production in response to RFP 6.
7	8	<p>Plaintiffs adopt Peterson RFP 8 for the purpose of these discussions:</p> <p>All Documents relating to Competitive Conditions in the markets for Cattle or Beef, including reports, presentations, industry publications, business plans, Studies, Analyses, or other Documents concerning: (i) market shares; (ii) consolidation, mergers, acquisitions, or joint ventures; (iii) production or processing capacity, capacity reduction, capacity utilization, or operating rates; (iv) fixed or variable costs; (v) pricing; (vi) inventories; (vii) entry or exit conditions; (viii) inventories; (ix) supplies/supply trends; (x) data, publications, or other sources used in the regular course of business by You to monitor Beef demand in the United States; (xi) substitute products; (xii) exports; (xiii) raw materials; (xiv) Beef Supply Factors; (xv) prices of Cattle or Beef at each level of</p>	January 1, 2012 – June 30, 2020 ⁶	January 1, 2012 – June 30, 2020

⁶ For the avoidance of doubt, this is the date range proposed in relation to Peterson RFP 8. JBS proposed January 1, 2014 to June 30, 2020 in response to Cattle RFP 7.

RFP No.	Relevant Peterson RFP(s)	Request	JBS's Proposed Date Range	Plaintiffs' Proposed Date Range
		distribution, including the extent that costs were passed on; (xvi) effect of changes in the supply of Cattle or Beef on the price of Beef at each distribution level; (xvii) other industry statistics; and (xviii) communications with investors, Industry Analysts, benchmarking services, and/or Creditor Representatives.		
8	6, 7, 20 (to the extent that call for documents relating to cattle procurement / pricing)	All Documents and Communications utilized, created, maintained or generally referred to by Your management or Employees responsible for Fed Cattle procurement for negotiating, pricing, or setting the terms and conditions for the purchase of Fed Cattle, including pricing policies or guidelines; pricing methods, pricing formulas, bidding or authorization policies, procedures, or conventions for Your Cattle buyers to negotiate Fed Cattle purchases, including any Communications Concerning bidding guidelines, techniques, conventions, timings or restrictions; Documents providing guidance or instructions to Your Cattle buyers about implementation of any such Policies, as well as the identification of all Employees involved in procuring Fed Cattle; and template and concluded contracts used by You to purchase Fed Cattle.	January 1, 2012 – June 30, 2020	Agreed

RFP No.	Relevant Peterson RFP(s)	Request	JBS's Proposed Date Range	Plaintiffs' Proposed Date Range
9	6, 7, 20 (to the extent that they relate to beef sales and pricing)	All Documents and Communications utilized, created, maintained or generally referred to by Your management or Employees responsible for Beef sales for quoting or pricing Beef, including sales and pricing policies or guidelines; pricing methods, pricing formulas, bidding or authorization procedures for Your sales Employees to quote prices; including any Communications concerning sales guidelines, techniques, or restrictions; and Documents providing guidance to Your sales Employees about implementation of any such Policies, as well as the identification of all employees involved in selling Beef.	January 1, 2012 – June 30, 2020	Agreed
10	N/A	All Documents and Communications concerning your Cattle Futures transactions, your calculation of risk positions and risk limits, as well as the identification of all Employees involved in trading Cattle Futures. Included in this request are all Documents utilized, created, maintained, or generally referred to by Your Employees concerning setting, implementing, and adjusting Your Cattle Futures trading strategies and Policies, including those related to hedging, risk management, and speculation; concerning tracking, matching, and offsetting Your Cattle Futures positions; and concerning Your Cattle Futures orders	January 1, 2012 – June 30, 2020	Agreed

RFP No.	Relevant Peterson RFP(s)	Request	JBS's Proposed Date Range	Plaintiffs' Proposed Date Range
		placed, filled, cancelled, expired, closed out, and partially offset.		
11	N/A	All Documents and Communications concerning the available inventory and supply of Cattle in the U.S. and Canada, including the location of that inventory and supply and the proportion of that inventory and supply which had been purchased by You or another Beef packer. Included in this Request are Documents maintained or produced by You to record and estimate the inventory and supply of Cattle, changes in the inventory and supply of Cattle, and the perceived reasons for those changes.	<p>A. January 1, 2012 – December 31, 2013 (limited to non-privileged documents sufficient to show any periodic reports specified in Defendants' Objections and Responses).</p> <p>B. January 1, 2014 – June 3, 2020 (for non-privileged documents specified to be produced in Defendants' Objections and Responses).</p>	<p>A&B. January 1, 2012 – June 3, 2020</p> <p>Plaintiffs propose that the period January 1, 2012 – June 30, 2020, apply, but are willing to meet and confer with JBS regarding its proposed split date range. The proposed distinction drawn between responsiveness of documents falling within the two time periods proposed by JBS is presently unclear to Plaintiffs.</p>

RFP No.	Relevant Peterson RFP(s)	Request	JBS's Proposed Date Range	Plaintiffs' Proposed Date Range
12	1	All Documents and Communications concerning the operation and utilization of Your Cattle slaughter and fabrication plants and associated cold storage facilities. Included in this Request are all Documents and Communications concerning proposed, considered, or actual changes in plant utilization or capacity; any proposed, considered, or actual decision to close, sell, slow, or idle a plant; slaughter and processing costs, including labor, energy, equipment, and all other non-Cattle costs associated with the operation of the plant; and Structured Data sufficient to show for each U.S. slaughter plant, fabrication, cold storage facility, and distribution center You operate in the United States the categories of information listed below as they may apply: [...].	<p>A. January 1, 2012 – December 31, 2013 (limited to non-privileged documents sufficient to show the number of Cattle slaughtered at Defendants' plants and non-privileged documents sufficient to show any decisions made to increase the capacity in facilities that slaughter or process Cattle).</p> <p>B. January 1, 2014 – June 3, 2020 (for non-privileged documents specified to be produced in Defendants'</p>	A&B. January 1, 2006 – December 31, 2021, for structured data responsive to this Request. January 1, 2012 – June 30, 2020, for other responsive documents.

RFP No.	Relevant Peterson RFP(s)	Request	JBS's Proposed Date Range	Plaintiffs' Proposed Date Range
			Objections and Responses).	
13	5, 8	Documents and Communications concerning any studies, predictive analyses, reports, white papers, analytics, or other methods used by You concerning Your Cattle Business. Included in this request are all Documents utilized or generally referred to by Your management or Employees to forecast, record, and analyze profits, revenues, and/or costs (whether actual, budgeted, or forecasted) of Your purchases of Fed Cattle and/or sales of Beef and/or transactions in Cattle Futures, and all Communications concerning those Documents.	<p>January 1, 2012 – December 31, 2013 (limited to non-privileged documents sufficient to show any periodic reports specified in Defendants' Objections and Responses).</p> <p>January 1, 2014, – June 3, 2020 (for non-privileged documents specified to be produced in Defendants' Objections and Responses).</p>	<p>January 1, 2012 – June 30, 2020.</p> <p>Plaintiffs propose that the period January 1, 2012, to June 30, 2020, apply, but are willing to meet and confer with JBS regarding its proposed split date range. The proposed distinction drawn between responsiveness of documents falling within the two time periods proposed by JBS is presently unclear to Plaintiffs.</p>

RFP No.	Relevant Peterson RFP(s)	Request	JBS's Proposed Date Range	Plaintiffs' Proposed Date Range
14	5, 8	Documents and Communications concerning any relationship between the pricing of, and supply and demand for, Fed Cattle, feeder cattle, cull cows and bulls, Cattle Futures, and Beef. This Request includes Documents and Communications describing factors determining supply (such as weather, disease, regulations, and all other factors You have described or discussed) and factors determining demand (such as population, income, tastes, substitute products, regulations, and all other factors You have described or discussed).	<p>January 1, 2012 – December 31, 2013 (limited to non-privileged documents sufficient to show any periodic reports specified in Defendants' Objections and Responses).</p> <p>January 1, 2014 – June 3, 2020 (for non-privileged documents specified to be produced in Defendants' Objections and Responses).</p>	<p>January 1, 2012 – December 31, 2020.</p> <p>Plaintiffs propose that the period January 1, 2012, to June 30, 2020, apply, but are willing to meet and confer with JBS regarding its proposed split date range. The proposed distinction drawn between responsiveness of documents falling within the two time periods proposed by JBS is presently unclear to Plaintiffs.</p>

RFP No.	Relevant Peterson RFP(s)	Request	JBS's Proposed Date Range	Plaintiffs' Proposed Date Range
15	N/A	Documents sufficient to identify any means of communication You used in Your Cattle Business. This includes, but is not limited to, any means of electronic messaging, any messaging applications, or social media used for work purposes, or any proprietary messaging or communication systems You used during the Relevant Period.	January 1, 2012 – June 30, 2020	Agreed
16	N/A	All documents and communications concerning any Trade Association meetings, industry conferences, charity events, or other functions that were or may have been attended by any of Your Employees whose job function concerned Your Cattle Business, including: (a) meeting announcements; (b) agendas; (c) minutes; (d) notes; (e) invitee and attendee lists; (f) handouts; (g) reports; (h) statistical bulletins; (i) correspondence; and (j) Documents and Communications concerning Your participation in those meetings.	January 1, 2014 – June 30, 2020	January 1, 2012 – June 30, 2020 Plaintiffs are willing to meet and confer with JBS as to whether there are specific categories of responsive documents during the disputed period between January 1, 2012, and December 31, 2013, that might be appropriately excluded from its production in

RFP No.	Relevant Peterson RFP(s)	Request	JBS's Proposed Date Range	Plaintiffs' Proposed Date Range
				response to RFP 16.
17	N/A	<p>For each Document Custodian, all:</p> <p>a. electronic and hard copy diaries, calendars, appointment books or notes, notebooks, or to-do lists;</p> <p>b. contact information maintained in electronic or hard copy format, for any person who is or was an owner, Employee, consultant, officer, board member, representative, or agent of:</p> <p>(i) a Beef packer; (ii) a Producer; (iii) an industry or financial analyst; (iv) an Employee of a trade association; (v) future commission merchants or brokerage and clearing organizations; (vi) an Employee of a non-Defendant that provides financing to Beef packers;</p> <p>c. trip and travel logs and records, expense reports, and entertainment reports, including any other supporting Documents;</p> <p>d. bills, statements, records, and supporting Documents concerning local, long distance, and cellular telephone calls by such Document Custodian, including calls made using telephones not paid for by You (such as home office, fax, and personal telephone numbers, personal cellphones, and</p>	<p>Defendants stand on their Objections and refusal to produce documents in response to this Request. Without waiving Defendants' Objections and subject to Defendants' proposal to meet-and-confer, June 1, 2014 to June 30, 2020 for any documents to be produced.</p>	<p>January 1, 2012 – June 30, 2020</p> <p>Plaintiffs are willing to meet and confer with JBS as to whether there are specific categories of responsive documents, for one or more custodians, during the disputed period between January 1, 2012, and December 31, 2013, that might be appropriately excluded from its production in response to RFP 17.</p>

RFP No.	Relevant Peterson RFP(s)	Request	JBS's Proposed Date Range	Plaintiffs' Proposed Date Range
		<p>temporary pay-as-you go cellphones) if such telephones were used for business purposes;</p> <p>e. Documents relating to membership in any Trade Association or industry group or attendance at any Trade Association, industry group meeting, or investor conference, including announcements, membership lists, presentations (including speaker notes), agendas, minutes, notes, attendance lists, and correspondence;</p> <p>f. a copy of the Document Custodian's most recently created resume or curriculum vitae (CV);</p> <p>g. copies of any transcripts or recordings of any testimony of the Document Custodian relating to Your or another packer's Cattle Business, such as testimony at a deposition, trial, or public hearing;</p> <p>h. Documents sufficient to show the Document Custodian's complete contact information, including all phone numbers, social media user names or "handles," and email addresses used by such persons for any business purposes, even if only sparingly; and</p> <p>i. Any severance agreements in connection with the Document Custodian ceasing employment or changing employment status with You (without time limitation).</p>		

RFP No.	Relevant Peterson RFP(s)	Request	JBS's Proposed Date Range	Plaintiffs' Proposed Date Range
18	N/A	<p>For each database You used to produce Structured Data, Documents, or other information in response to these Requests, as well as any other database that You use to store data or Structured Data concerning Your Cattle Business:</p> <p>a. documents sufficient to show the reports and the reporting capabilities of each database – whether pre-configured or configured on an ad-hoc basis, and whether created on a regular or ad-hoc basis;</p> <p>b. all data maps, data dictionaries, and document retention policies related to the database;</p> <p>c. exemplars of each type of report generated in the ordinary course of business from each database through an automated task or process, and the frequency with which such reports are generated (<i>e.g.</i>, daily, weekly, monthly, quarterly, or annually);</p> <p>d. exemplars of all tables and/or files in each database; and</p> <p>e. exemplars of all fields for the tables and/or files identified in the immediately preceding request, and the descriptions and/or definitions for these fields.</p>	<p>January 1, 2014 – June 30, 2020</p> <p>Defendants will meet-and-confer about the date ranges and the scope of the Request as indicated in their Objections and Responses to Plaintiffs' Requests for Production.</p>	<p>January 1, 2006 – December 31, 2021</p> <p>Plaintiffs propose that the period January 1, 2009, to December 31, 2021 apply, but are willing to meet and confer with JBS to discuss both the availability of data and the appropriate start date of any such production.</p>
19	N/A	All Documents and Communications concerning Plaintiffs.	January 1, 2014 – June 30, 2020	Agreed.

RFP No.	Relevant Peterson RFP(s)	Request	JBS's Proposed Date Range	Plaintiffs' Proposed Date Range
20	16	All Documents and discovery requests or responses provided to plaintiffs, received from plaintiffs, or provided to or received from third parties in actions related to this claim, including <i>Peterson v. JBS USA Food Company Holdings, et al.</i> , No. 19-cv-01129 (D. Minn.).	JBS, Defendants refer Plaintiffs to the proposed Date Ranges relating to the <i>Peterson</i> Requests for any document to be produced.	Plaintiffs propose the date ranges ultimately agreed between JBS and the Plaintiffs in relation to these discovery items in coordinated matters.

Proposed Date Ranges for Peterson Set One Non-Crossover RFPs

RFP No.	Request	JBS's Proposed Date Range	Plaintiffs' Proposed Date Range
4.	Copies of all Telephone Records in your possession, custody, or control, including Telephone Records of your main phone number(s), main fax number(s), and any phone number used as a switchboard for any of your relevant facilities such as your headquarters, administrative offices, Cattle Farms, Beef Processing Facilities, and Beef sales offices.	Without waiving JBS USA Holdings's objections and subject to its willingness to meet-and-confer, January 1, 2014 to December 31, 2019 for any documents to be produced.	January 1, 2012 – December 31, 2021 Plaintiffs are willing to meet and confer with JBS as to whether there are specific categories of responsive documents, for one or more custodians, during the disputed period between January 1, 2012 and December 31, 2013 that might appropriate be excluded from its production in response to RFP 4.
9.	All Documents concerning Cattle or Beef slaughter reduction/restraint or supply rationalization, industry leadership, industry discipline, production discipline, supply discipline, capacity discipline, or other so-called disciplined approaches or practices relating to the Cattle or Beef industries.	January 1, 2012 – December 31, 2013 (limited to non-privileged documents sufficient to show the number of Cattle slaughtered at Defendants' plants and any decisions made to increase the	January 1, 2006 – December 31, 2021, for structured data responsive to this Request.

RFP No.	Request	JBS's Proposed Date Range	Plaintiffs' Proposed Date Range
		<p>capacity in facilities that slaughter or process Cattle).</p> <p>January 1, 2014 – December 31, 2019 (for documents specified to be produced in Defendants' Objections and Responses).</p> <p>For any data, January 1, 2014 – June 30, 2020 but the JBS Defendants will meet-and-confer about the date ranges and scope of the data portion of the Request as indicated in their Responses and Objections.</p>	<p>January 1, 2012 – June 30, 2020 for other responsive documents.</p> <p>Plaintiffs are willing to meet and confer with JBS regarding its proposed split date range. The proposed distinction drawn between responsiveness of documents falling within the two time periods proposed by JBS is presently unclear to Plaintiffs.</p>
10.	Documents relating to actions to conceal or avoid detection of any potential violations of federal, state, or international antitrust laws, competition laws, anti-monopoly laws, anti-cartel laws, unfair competition laws, anti-bribery laws and any similar laws, rules or regulations (including the use of code words or otherwise masking the identity of any Person or entity, meeting in locations or communicating at times or via methods with	January 1, 2014 – June 30, 2020	January 1, 2012 – June 30, 2020

RFP No.	Request	JBS's Proposed Date Range	Plaintiffs' Proposed Date Range
	the intent to avoid detection by any Person or entity, using non-traceable prepaid calling cards or cellphones, non-contract or disposable cell phones, placing calls from public phones, and destroying, secreting, altering or forging Documents).		
11.	All Documents sufficient to show Your corporate organizational structure throughout the Relevant Time Period, including, but not limited to, departments, divisions, parents, subsidiaries, joint ventures, affiliates, units or other subdivisions that had any role at any time during the Relevant Time Period in the production, processing, distribution, marketing, pricing or sale of Cattle or Beef.	January 1, 2012 – June 30, 2020	January 1, 2012 – December 31, 2021
12.	Documents sufficient to describe in detail the Beef products You sold, marketed, or distributed from January 1, 2009, through the present, including any variations relating to brand name, physical properties and characteristics, packaging, product form, cut, further processing, grade, specialty products and any other factors influencing price, including Documents sufficient to show why and how You labeled, marked, and/or branded Your Beef during the Relevant Time Period, for purposes of product tracking, quality, safety, and/or regulatory compliance.	January 1, 2012 – June 30, 2020	Plaintiffs propose that the period January 1, 2006 – December 31, 2021 apply, but are willing to meet and confer with JBS to discuss both the availability of data and the appropriate start date of any such production.

RFP No.	Request	JBS's Proposed Date Range	Plaintiffs' Proposed Date Range
15.	<p>For the time period from January 1, 2009 through the present, any Structured data relating to downstream sales by Your direct purchaser or other downstream purchasers, including:</p> <ul style="list-style-type: none"> a. the terms of each sale; b. the invoice number; c. the purchase order number; d. the location from which the Beef was shipped; e. the customer's name, phone number(s), address(es), email address(es), including the identity of the customer that was billed and the location to which the Beef was shipped; f. the date You shipped the Beef, the date You billed for the Beef, and the date the customer took delivery; g. the grade, cut, product form, and/or type of Beef, including any product numbers, unique purchaser-specific identifier, any description of characteristics, and product descriptions sold for each transaction; 	<p>January 1, 2014 – June 30, 2020</p> <p>JBS Defendants will meet-and-confer about the date ranges and the scope of the Request as indicated in its Objections and Responses.</p>	<p>Plaintiffs propose that the period January 1, 2009 – June 30, 2020 apply, but are willing to meet and confer with JBS to discuss both the availability of data and the appropriate start date of any such production.</p>

RFP No.	Request	JBS's Proposed Date Range	Plaintiffs' Proposed Date Range
	<p>h. the quantity (and units of measure) for each sale;</p> <p>i. all pricing information concerning the sale, including shipping, tax, or similar charges, and the gross and net unit price for each item in the sale;</p> <p>j. the currency in which the sale was billed and paid;</p> <p>k. any discounts, rebates, credits, freight allowances, returns, free goods, and/or services or any other pricing adjustment for each sale, with sufficient information to attribute these adjustments to individual sales;</p> <p>l. if a resale, the Supplier of each Cattle or Beef sold in connection with each sale;</p> <p>m. the price You paid Your Supplier for each type of Cattle or Beef sold in connection with each sale, including gross and net aggregate and per-unit prices;</p> <p>n. any fixed or variable costs or costs of goods sold concerning the sale (including freight charge and transportation cost, sales and distribution cost, raw materials, intermediates, marketing or sales cost, and any other cost attributed or allocated to the sale);</p>		

RFP No.	Request	JBS's Proposed Date Range	Plaintiffs' Proposed Date Range
	<p>o. for any sale or purchase from another Beef Processor, Electronic Data Interchange fields for which the user can freely enter text, such as “comments” or similar fields;</p> <p>p. any Structured Database field summarizing terms of sale or agreements or contracts for customers;</p> <p>q. any other data available in Your database Concerning the purchase, sale or distribution of the Cattle or Beef for each sale.</p>		
17.	All Documents concerning the costs of and potential obstacles to entering the Cattle or Beef markets, including, but not limited to, capital costs, environmental regulations, production costs, marketing costs and difficulties, contractual supply relationships, market conditions, brand loyalty or differentiation, start-up costs, and any other difficulties or obstacles to entry into the market for producing and selling Cattle or Beef.	January 1, 2012 – June 30, 2020	Agreed.
18.	Documents sufficient to show actual or potential substitutes for Beef, or the elasticity of supply, demand, or price of Beef, analyzed by You during the Class Period (including the effect of such substitutes' prices upon Beef pricing, purchase terms, or profits).	January 1, 2012 – June 30, 2020 (for documents specified to be produced in Defendants' Objections and Responses).	Agreed.

RFP No.	Request	JBS's Proposed Date Range	Plaintiffs' Proposed Date Range
19.	All Documents, summaries, reports, data or point of sale information concerning the pricing of Beef provided by direct purchasers or other downstream purchasers of Beef to You for the Relevant Period.	January 1, 2012 – June 30, 2020	Agreed.

Dated: November 9, 2021

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CERTIFICATE OF SERVICE

I hereby certify that on November 9, 2021, a true and correct copy of the foregoing PLAINTIFFS' JOINT REVISED PROPOSAL RE: DOCUMENT CUSTODIANS, NON-CUSTODIAL DOCUMENT SOURCES, AND DATE RANGES TO JBS USA FOOD COMPANY, SWIFT BEEF COMPANY, AND JBS PACKERLAND, INC. was served by email on Defendants' counsel of record.

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